## KAUFMAN LEGAL GROUP A PROFESSIONAL CORPORATION

November 11, 2016



Direct (213) 452-6550

## **VIA U.S. MAIL AND E-MAIL**

Jeff S. Jordan
Office of General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

Re:

**FEC MUR 7131** 

Dear Mr. Jordan:

We are writing in response to the additional allegations by Brian Griset ("Supplemental Complaint") on October 17, 2016 in MUR 7131.

The Supplemental Complaint contains unsubstantiated allegations that NGP Van, Inc. ("NGP"), a commercial reporting software vendor, provided in-kind contributions to our client, Senior Votes Count, in the form of two credits. On its 2014 Year-End Report, Senior Votes Count ("Committee") reported two credits in the amount of \$250 and \$300 in connection with debts owed to NGP. At that time, the Committee included explanatory text indicating that the amounts were invoiced in error by the vendor. Despite that explanation, the complainant speculates about a "repeating pattern of debt forgiveness" between Senior Votes Count and NGP that resulted in NGP making "after the fact 'in-kind contributions'" to the Committee.

The fact of the matter is, the Committee was billed \$250 and \$300 by NGP for services that it never utilized. Thus, Senior Votes Count requested a billing adjustment and received credits for those charges. As stated earlier, Senior Votes Count reported the credits with the explanatory text to clearly indicate that the Committee was invoiced in error. Thus, these transactions do not represent any form of debt forgiveness or in-kind contributions from NGP to the Committee.

As with the initial complaint, the Supplemental Complaint is purely speculative and does not provide any factual or legal basis for asserting a violation of the Federal Election Campaign Act of 1971, as amended ("the Act") or Commission regulations. Consequently, there is no reason to believe Kaufman Legal Group may have violated any provision of the Act. Therefore, we

November 11, 2016 Page 2

respectfully request that the Commission dismiss this matter, and take no further action against our firm.

Very truly yours,

Stephen J. Kayıman

SJK:sjs

cc: Donna Rawls (via U.S. Mail and E-mail)